UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO (COLUMBUS)

Linda A. Armstrong	)	**Case No. 16-50186**
SSN: xxx-xx-9744	)	
	)	**Chapter 13**
	)	
Debtor.	)	**Judge John E. Hoffman, Jr.**

MOTION FOR RELEASE OF DEBTOR FROM MOTOR VEHICLE LEASE AGREEMENT

Now comes Debtor, Linda A. Armstrong, and hereby moves the Court for an Order to permit her to be removed as a "co-lessee" on an Ohio Motor Vehicle Lease Agreement with her non-filing spouse and Ford Motor Credit Company, LLC. Ford Motor Credit Company, LLC's financing is through CAB East LLC.

Debtor's husband, Jeffrey L. Armstrong (Lessee) and Debtor entered into a 24-month lease agreement with Ford Motor Credit Company, LLC on a 2015 Ford F-150 on July 18, 2015. The vehicle is Debtor's husband's mode of transportation. Debtor's husband is responsible for the lease payments and the lease payments are being paid outside of Debtor's Chapter 13 Plan.

Debtor's husband is eligible under a Ford Program called the "Early Lease Turn-In Deal". Ford Motor Credit Company, LLC has requested a release of Debtor from the existing lease with Ford. Debtor's husband will then be permitted to enter into a new lease agreement with Ford and Debtor will not be a "co-lessee".

WHEREFORE, Debtor requests that the Court grant her Motion to Release Debtor from Motor Vehicle Lease Agreement.

Respectfully submitted,

Dated: March 27, 2017

/s/ Kenneth L. Sheppard, Jr.

Kenneth L. Sheppard, Jr. (0075887)
Attorney for Debtor
Sheppard Law Offices, Co., L.P.A.
2600 Tiller Lane, Suite A
Columbus, OH 43231
Phone: (614) 523-3106
Fax: (614) 882-6750
E-Mail: ken@sheppardlawoffices.com

NOTICE OF MOTION FOR RELEASE OF DEBTOR FROM MOTOR VEHICLE LEASE AGREEMENT

Linda A. Armstrong, the Debtor herein, has filed papers with the court to extend the automatic stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant Debtor's Motion, or if you want the court to consider your views on the Motion, then on or before **21 days after the date printed below, you or your attorney must:

File a written response to the motion, explaining your position and requesting a hearing, at:

Clerk, U.S. Bankruptcy Court
170 North High Street
Columbus, OH 43215

If you mail your response to the Court for filing, you must mail it early enough so the court will receive it on or before twenty-one (21) days from the date below.

You must also mail a copy to: Sheppard Law Offices Co., LPA
2600 Tiller Lane, Suite A
Columbus, OH 43231

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

**A Motion to Shorten Response Time to 10 days was filed contemporaneously with this Motion

Dated: **March 27, 2017**

/s/ Kenneth L. Sheppard, Jr.
Kenneth L. Sheppard, Jr. (0075887)
Thomas J. Archer (0090663)
Attorneys for Debtor
Sheppard Law Offices, Co., L.P.A.
2600 Tiller Lane, Suite A
Columbus, Ohio 43231
Phone: (614) 523-3106
Fax: (614) 882-6750
E-Mail: ken@sheppardlawoffices.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Motion For Release Of Debtor From Motor Vehicle Lease Agreement and Notice was served by electronic transmission or regular U.S. mail on the **27th** day of **March 2017** upon:

Name of Parties Served:

VIA electronic transmission:

Asst US Trustee (Col)	ustpregion09.cb.ecf@usdoj.gov
Faye D. English, Chapter 13 Trustee	notices@ch13columbus.com
Edward A. Bailey, Esq.	ebailey@reimerlaw.com

/s/ Kenneth L. Sheppard, Jr.
Kenneth L. Sheppard, Jr. (0075887)
Attorney for Debtor